

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: : Bankruptcy No. 21-10257-PMM
SCOTT E. BARTHOL, :
Debtor. :

**RESPONSE TO MOTION OF FREEDOM MORTGAGE CORPORATION
FOR RELIEF FROM THE AUTOMATIC STAY**

AND NOW comes the Debtor, Scott E. Barthol, by and through his attorney, Stephen M. Otto, Esquire, and files the within Response, of which the following is a statement:

1. Admitted.
2. Admitted.
3. Admitted.
4. Denied. The property has substantial equity which serves to protect Movant.
5. Admitted.
6. Admitted.
7. Denied. In way of further answer, one or more payments has/have been made since the filing of Movant's Motion.
8. Admitted.
9. Denied. Debtor is without knowledge or information sufficient to form a belief as to the truth or accuracy of the averment.
10. Denied. Debtor is without knowledge or information sufficient to form a belief as to the truth or accuracy of the averment.
11. The allegation is a legal conclusion to which no response is necessary.
12. Admitted.
13. The allegation is a legal conclusion to which no response is necessary.
14. The allegation is a legal conclusion to which no response is necessary.
15. No response necessary.

WHEREFORE, Debtor respectfully requests this Honorable Court deny Movant's request.

Respectfully submitted,
LAW OFFICE OF STEPHEN M. OTTO, LLC

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